

Ms. Eileen S. Stomes  
Deputy Administrator  
USDA-AMS-TM-NOP  
Rm 4007 - So., Ag. Stop 0275  
P.O. Box 96456  
Washington DC, 20090-6456

Dear Ms. Stomes:

I object strongly to the USDA NOP rules as proposed under docket # TMD-94-00-2. These rules completely ignore the will of the people as expressed through Congress by the OFPA of 1990. This law established the NOSB as an advisory committee to the Secretary of Agriculture.

The proposed rules disregard the recommendations made by the NOSB. These rules would allow sewage sludge, ionizing radiation, and genetically engineered organisms (section 205.2, 205.8, 205.9, 205.22, 205.26, 205.17). They would allow confinement operations, liberal drug use, and non-organic feed for livestock (section 205.13-205.15). They would place an unfair burden on small farmers, certifiers, and processors with a regressive flat fee for certification and registration (section 205.421-205.425). Further exacerbating this attack on existing organic practices and international trade standards, the proposed rules prohibit labeling produce with additional information about how it is produced (section 205.103). Each of these sections departs radically from the NOSB recommendations.

The U.S. congress correctly acted to protect the safety and sustainability of our food supply. The rules proposed by the USDA protect the profits of agribusiness at the expense of the consumer and the small organic farmer. This is the kind of beaurocratic meddling which erodes the confidence of the people in their government. These rules need to be rewritten to reflect the NOSB recommendations.

Sincerely,